

# **FACT SHEET FOR STATE WASTE DISCHARGE PERMIT ST-7324**

**FACILITY NAME: SAKUMA BROS. FARM, INC.**

<b>GENERAL INFORMATION</b>	
Applicant	Glenn Sakuma, Vice President
Facility Name and Address	SAKUMA BROS. FARM, INC. 17400 Cook Road Burlington, WA 98233
Type of Facility	Berry Processing SIC 5148
Type of Treatment	Filtration then land application via drip irrigation and spray irrigation
Discharge Location	Groundwater via land application Latitude: 48° 30' 20" N Longitude: 122° 22' 00" W
Legal Description of Application Area	SW ¼ of Section 24, Township 35N, Range 3E, W.M. Parcel No.: P34786, P34777, P34809, drip irrigated Parcel No.: P34772, overhead irrigated
Contact and Responsible Official	Glenn Sakuma, Vice President P.O. Box 427 Burlington, WA 98233 Telephone #: (360) 757-6611 FAX #: (360) 757-3936 glenn@sakumabros.com

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## **INTRODUCTION**

This fact sheet is a companion document to the draft State Waste Discharge Permit No. ST-7324. The Department of Ecology (the Department) is proposing to issue this permit, which will allow discharge of wastewater to waters of the state of Washington. This fact sheet explains the nature of the proposed discharge, the Department's decisions on limiting the pollutants in the waste water, and the regulatory and technical bases for those decisions.

Washington State law (RCW 90.48.080 and 90.48.162) requires that a permit be issued before discharge of wastewater to waters of the state is allowed. Regulations adopted by the state include procedures for issuing permits (chapter 173-216 WAC), and water quality criteria for ground waters (chapter 173-200 WAC). They also establish requirements which are to be included in the permit.

This fact sheet and draft permit are available for review by interested persons as described in Appendix A—Public Involvement Information.

The fact sheet and draft permit have been reviewed by the Permittee. Errors and omissions identified in these reviews have been corrected before going to public notice. After the public comment period has closed, the Department will summarize the substantive comments and the response to each comment. The summary and response to comments will become part of the file on the permit and parties submitting comments will receive a copy of the Department's response. Changes to the permit will be addressed in Appendix C—Response to Comments.

## BACKGROUND INFORMATION

### DESCRIPTION OF THE FACILITY

#### HISTORY

Sakuma Bros. Farm, Inc., has been processing fresh berries at this location since 1991. They added a storage lagoon for wastewater storage in 2003. The processing facility was expanded in 2003 to include a freezing operation.

#### INDUSTRIAL PROCESSES

This is a very seasonal operation, with operations conducted 24 hours a day, 7 days a week for about a 10-week window between June and September. Repack occurs during the winter months, producing some wash water that is pumped to the storage lagoon.

Fresh strawberries, raspberries, and blueberries arrive from the fields via truck and are weighed, graded, washed, sorted, inspected, sliced or left whole, mixed with sugar or not, packed in various poundage containers and shipped to cold storage.

The wash water and waste water from the clean-up operations is collected in floor gutters and screened through a fine mesh screen prior to discharge to a 750-gallon collection tank. The waste water is then pumped to a holding tank where the pH is monitored and adjusted with caustic soda-NaOH as needed. From the holding tank, the waste water is either pumped to an unlined, 750,000-gallon holding lagoon or to land application via overhead sprinklers. The pond water gravity flows to a sand filter system in series and then is pumped to the drip irrigation system.

Liquid chlorine, at a concentration of 7 ppm, is added to the strawberry washwater to reduce water usage. Water is recirculated for crate washing.

#### TREATMENT PROCESSES

The previous permits were for land application of berry washing wastewater. The spray field and application operations were outlined in an Ecology-approved Engineering Report dated February 1991. The screened and pH adjusted wastewater was applied to the fields owned and operated by Sakuma Bros. Farm, Inc., via a manure spreader. The field was seeded with a perennial rye grass, annual rye grass and orchard grass mix, and was harvested about four to five times a year.

Some of the waste water is overhead sprayed to cropland from the collection tank, located upstream of the lagoon. The current system also includes a 750,000-gallon bentonite-lined lagoon, sand filtration, and then drip irrigation to rows of blueberry and raspberry bushes. The lagoon system was a Natural Resources Conservation Services project. Estimated daily maximum application to land is 100,000 gallons. Monthly averages are estimated at 75,000 gpd. Daily and monthly flow amounts, crop uptake calculations, and nutrient balance are required to be submitted annually in the crop management plan and the annual report.

The berries are harvested, but there is no “plant” harvesting, as was previously permitted. This permit requires wastewater monitoring and soil monitoring to ensure there are no negative impacts to ground water. A nutrient balance will be calculated annually and discussed in the crop plan (to be prepared and submitted by Sakuma Bros. Farm, Inc.) based on the monitoring information from both the overhead spraying and drip irrigation activities.

#### DISTRIBUTION SYSTEM

The waste water will be drip irrigated on blueberry and raspberry bushes planted on about 100 acres (parcels P34786, P34777, P34809) or overhead sprayed on grassland (parcel P34772). The distribution system is drip irrigation via lines that run down the rows of blueberry and raspberry bushes. No rate was given in the permit application. Application rates will be evaluated from the crop plan and the annual report.

No engineering report was submitted covering the new irrigation system. The soil was characterized in the 1991 Engineering Report as silt loam. (Refer to the 1991 Engineering Report for detailed discussion.) The main processing season is June through September. Winter application is not anticipated, unless the integrity of the lagoon is compromised due to high rainfall.

Treatment efficiency of the land application system will be evaluated annually in the irrigation and crop management plan and by reviewing the monitoring data.

#### GROUND WATER

The pretreated process waste water and wash water are surface applied by drip irrigation to raspberry and blueberry bushes. The waste water reaches ground water via infiltration on the fields and possibly via the dug lagoon. The ground water is believed to ultimately flow to the Samish River, Class AA. The groundwater table has a seasonal depth ranging from 0.5 feet in the winter to 4.0 feet in the summer months, according to the *Soil Conservation Service Manual*, 1989 Edition. The drip irrigation activities will be conducted during the summer months.

Some of the waste water is overhead sprayed to grassland and strawberry rows. This, however, consumes a minor portion of the waste water. The irrigation of crops is supplemented with well water as needed.

#### PERMIT STATUS

The previous permit for this facility was issued on June 28, 1996, with an expiration date of June 28, 1998. An application for permit renewal was submitted to the Department on January 8, 1998. A temporary permit was issued on June 19, 1998. Sakuma Bros. Farm, Inc., expressed interest in being classified as a “De Minimis Discharger” per the *Ecology Permit Writer’s Manual*. Ecology personnel met with Sakuma Bros. Farm, Inc., personnel to discuss this option and provided them with the requirements and submittals needed by the Department to evaluate the request. No application for de minimis status was received, so permit reapplication was required.

An updated application for permit renewal was submitted to the Department on September 16, 2004, and accepted by the Department on August 15, 2005.

### *SUMMARY OF COMPLIANCE WITH THE PREVIOUS PERMIT*

The facility last received a permit compliance inspection on July 7, 2005. The inspection report recommended berming and containing the leaking wastewater around the old round sump near the lagoon.

During the history of the previous permit, the Permittee has been out of compliance because of failure to submit the permit required Annual Reports that include the monthly DMRs. The following Annual Reports have been received:

1998, 1999, 2000, 2001

The Annual Reports from 2002-2005 have not been submitted to the Department.

### *WASTEWATER CHARACTERIZATION*

The concentration of pollutants in the discharge was reported in the permit application. The proposed wastewater discharge prior to infiltration or land application is characterized for the following parameters:

**Table 1: Wastewater Characterization**

Location	Date of Sample	Parameter	Concentration
Wastewater, Tank 1	July 3, 2003	BOD <sub>5</sub>	430 mg/L
“ “		TKN-Nitrogen	4.0 mg/L
“ “		TSS	180 mg/L
“ “		pH	5.81 standard units
“ “		NO <sub>2</sub> -NO <sub>3</sub>	< 0.1
Wastewater, Tank 1	May 27, 2004	BOD <sub>5</sub>	390 mg/L
“ “		TKN	7.0 mg/L
“ “		TSS	190 mg/L
“ “		pH	4.64 standard units

### *SEPA COMPLIANCE*

This is an existing facility, therefore, SEPA compliance is not required. SEPA was fulfilled for the irrigation pond project in 2002.

### **PROPOSED PERMIT LIMITATIONS**

State regulations require that limitations set forth in a waste discharge permit must be either technology- or water quality-based. Waste water must be treated using all known, available and reasonable treatment (AKART) and not pollute the waters of the state. The minimum requirements to demonstrate compliance with the AKART standard were determined in the engineering report (Sakuma Brothers Farm, Inc., Engineering Report, February 19, 1991).

The permit requires reporting of quantity and quality of the waste water applied to the application field so a determination can be made concerning groundwater protection. Water quality-based limitations are based upon compliance with the ground water quality standards (chapter 173-200 WAC).

The more stringent of the water quality-based or technology-based limits are applied to each of the parameters of concern. Each of these types of limits is described in more detail below.

#### *TECHNOLOGY-BASED EFFLUENT LIMITATIONS*

All waste discharge permits issued by the Department must specify conditions requiring available and reasonable methods of prevention, control, and treatment of discharges to waters of the state (WAC 173-216-110). The following permit limitations are necessary to satisfy the requirement for AKART:

Waste water must be screened prior to discharge to the land application site.  
pH shall be between 6.0 and 8.5 prior to drip or overhead irrigation.

#### *GROUND WATER QUALITY-BASED EFFLUENT LIMITATIONS*

In order to protect existing water quality and preserve the designated beneficial uses of Washington's ground waters, including the protection of human health, WAC 173-200-100 states that waste discharge permits shall be conditioned in such a manner as to authorize only activities that will not cause violations of the ground water quality standards. Drinking water is the beneficial use generally requiring the highest quality of ground water. Providing protection to the level of drinking water standards will protect a great variety of existing and future beneficial uses.

Applicable groundwater criteria as defined in chapter 173-200 WAC and in RCW 90.48.520 for this discharge include the following:

**Table 2: Ground Water Quality Criteria**

Total Dissolved Solids	500 mg/L
Nitrate	10 mg/L
pH	6.5 to 8.5 standard units
Toxics	No toxics in toxic amounts

The Department has reviewed existing records and is unable to determine if background ground water quality is either higher or lower than the criteria given in chapter 173-200 WAC. AKART for pH was determined in the General Fruit Packers permit as 6.0 – 9.0 standard units. Waste water from berry processing is generally acidic. The Department chose the pH limit of 6.0 – 8.5 standard units for this permit and will reevaluate the lower pH limit during the next permit cycle. Based on the wastewater information provided in the application, Sakuma Bros. Farm, Inc., will have to neutralize the existing pH discharges prior to land application. The discharges authorized by this proposed permit are not expected to interfere with beneficial uses.

*COMPARISON OF LIMITATIONS WITH THE EXISTING PERMIT*

**Table 3: Comparison of Previous and New Limits**

Parameter	Existing Limits	Proposed Limits
Flow	99,999 gpd, daily maximum	To be determined annually, based on the annual report
pH	Between 6.0 – 9.0 standard units	Between 6.0 – 8.5 standard units

**MONITORING REQUIREMENTS**

Monitoring, recording, and reporting are specified to verify that the treatment process is functioning correctly, that groundwater criteria are not violated, and that effluent limitations are being achieved (WAC 173-216-110). The waste water from the lagoon shall be monitored after sand filtration and before entering the drip irrigation or overhead sprinkler system.

*WASTEWATER MONITORING*

The monitoring schedule is detailed in the proposed permit under Condition S2. Specified monitoring frequencies take into account the quantity and variability of the discharge, the treatment method, past compliance, significance of pollutants, and cost of monitoring.

Monitoring for TDS, TSS, BOD, pH and Total Nitrogen is being required to further characterize the effluent. These pollutants could have a significant impact on the quality of the ground water or impact the permeability of the land application soils.

*CROP MONITORING*

Because there is no harvestable crop involved, crop monitoring is not required in this permit.

*SOIL MONITORING*

Soil monitoring is required once per year during October, for the term of the permit to verify land treatment of the waste water.

*GROUNDWATER MONITORING*

Monitoring wells are not required to be installed at this time, unless monitoring data indicate there may be an impact to ground water. Existing data on the quality of wastewater, the volume applied and the area applied to, will all be evaluated on an annual basis.

**OTHER PERMIT CONDITIONS**

*REPORTING AND RECORD KEEPING*

The conditions of S3 are based on the authority to specify any appropriate reporting and record keeping requirements to prevent and control waste discharges (WAC 173-216-110).



### *OPERATIONS AND MAINTENANCE*

The proposed permit contains Condition S4 as authorized under chapter 173-240-150 WAC and chapter 173-216-110 WAC. It is included to ensure proper operation and regular maintenance of equipment, and to ensure that adequate safeguards are taken so that constructed facilities are used to their optimum potential in terms of pollutant capture and treatment.

A complete Operations and Maintenance Manual and/or Engineering Report covering the holding lagoon and drip irrigation system has not been submitted to the Department for review. This permit requires the submittal of an Operations and Maintenance Manual specifically addressing the wastewater pretreatment and land application activities.

### *SOLID WASTE PLAN*

The Department has determined that the Permittee has a potential to cause pollution of the waters of the state from leachate of solid waste.

This proposed permit requires, under authority of RCW 90.48.080, that the Permittee develop and submit to the Department a Solid Waste Plan to prevent solid waste from causing pollution of waters of the state.

### *IRRIGATION AND CROP MANAGEMENT PLANS*

The Irrigation and Crop Management Plan is required to summarize loadings to the application fields and assess wastewater impacts. This plan shall include a consideration of wastewater application at agronomic rates and should describe and evaluate various irrigation controls. (*Irrigation Management Practices to Protect Ground Water and Surface Water Quality, State of Washington, August 1995*).

### *GENERAL CONDITIONS*

General Conditions are based directly on state laws and regulations and have been standardized for all industrial waste discharge to groundwater permits issued by the Department.

Condition G1 requires responsible officials or their designated representatives to sign submittals to the Department. Condition G2 requires the Permittee to allow the Department to access the treatment system, production facility, and records related to the permit. Condition G3 specifies conditions for modifying, suspending, or terminating the permit. Condition G4 requires the Permittee to apply to the Department prior to increasing or varying the discharge from the levels stated in the permit application. Condition G5 requires the Permittee to construct, modify, and operate the permitted facility in accordance with approved engineering documents. Condition G6 prohibits the Permittee from using the permit as a basis for violating any laws, statutes, or regulations. Conditions G7 and G8 relate to permit renewal and transfer. Condition G9 requires the payment of permit fees. Condition G10 describes the penalties for violating permit conditions.

### **RECOMMENDATION FOR PERMIT ISSUANCE**

This proposed permit meets all statutory requirements for authorizing a wastewater discharge, including those limitations and conditions believed necessary to control toxics, and to protect human health and the beneficial uses of waters of the state of Washington. The Department proposes that the permit be issued for a term of five (5) years.

### REFERENCES FOR TEXT AND APPENDICES

Faulkner, S.P., Patrick Jr., W.H., Gambrell, R.P., May-June, 1989. Field Techniques for Measuring Wetland Soil Parameters, Soil Science Society of America Journal, Vol. 53, No.3.

Washington State Department of Ecology, 1993. Guidelines for Preparation of Engineering Reports for Industrial Wastewater Land Application Systems, Ecology Publication # 93-36. 20 pp.

Washington State Department of Ecology.

Laws and Regulations (<http://www.ecy.wa.gov/laws-rules/index.html>)

Permit and Wastewater Related Information  
(<http://www.ecy.wa.gov/programs/wq/wastewater/index.html>)

Washington State Department of Ecology, 1996. Implementation Guidance for the Ground Water Quality Standards, Ecology Publication # 96-02.

Washington State University, November 1981. Laboratory Procedures - Soil Testing Laboratory. 38 pp.

Washington State University, August 1995. Irrigation Management Practices to Protect Ground Water and Surface Water Quality, State of Washington. EM4885, 194 pp.

## APPENDICES

### APPENDIX A—PUBLIC INVOLVEMENT INFORMATION

The Department has tentatively determined to reissue a permit to the applicant listed on page one of this fact sheet. The permit contains conditions and effluent limitations which are described in the rest of this fact sheet.

The Department published a Public Notice of Draft (PNOD) on April 3, 2006, in the *Skagit Valley Herald* to inform the public that a draft permit and fact sheet were available for review. Interested persons were invited to submit written comments regarding the draft permit. The draft permit, fact sheet, and related documents were available for inspection and copying between the hours of 8:00 a.m. and 5:00 p.m. weekdays, by appointment, at the regional office listed below. Written comments were mailed to:

Water Quality Permit Coordinator  
Department of Ecology  
Northwest Regional Office  
3190 – 160<sup>th</sup> Avenue SE  
Bellevue, WA 98008-5452

Any interested party may comment on the draft permit or request a public hearing on this draft permit within the thirty (30)-day comment period to the address above. The request for a hearing shall indicate the interest of the party and reasons why the hearing is warranted. The Department will hold a hearing if it determines there is a significant public interest in the draft permit (WAC 173-216-100). Public notice regarding any hearing will be circulated at least thirty (30) days in advance of the hearing. People expressing an interest in this permit will be mailed an individual notice of hearing.

Comments should reference specific text followed by proposed modification or concern when possible. Comments may address technical issues, accuracy and completeness of information, the scope of the facility's proposed coverage, adequacy of environmental protection, permit conditions, or any other concern that would result from issuance of this permit.

The Department will consider all comments received within thirty (30) days from the date of public notice of draft indicated above, in formulating a final determination to issue, revise, or deny the permit. The Department's response to all significant comments is available upon request and will be mailed directly to people expressing an interest in this permit.

Further information may be obtained from the Department by telephone, (425) 649-7201, or by writing to the address listed above.

This permit was written by Lori LeVander.

## APPENDIX B—GLOSSARY

**Average Monthly Discharge Limitation**—The average of the measured values obtained over a calendar month's time.

**Best Management Practices (BMPs)**—Schedules of activities, prohibitions of practices, maintenance procedures, and other physical, structural and/or managerial practices to prevent or reduce the pollution of waters of the state. BMPs include treatment systems, operating procedures, and practices to control: plant site runoff, spillage or leaks, sludge or waste disposal, or drainage from raw material storage. BMPs may be further categorized as operational, source control, erosion and sediment control, and treatment BMPs.

**BOD<sub>5</sub>**—Determining the Biochemical Oxygen Demand of an effluent is an indirect way of measuring the quantity of organic material present in an effluent that is utilized by bacteria. The BOD<sub>5</sub> is used in modeling to measure the reduction of dissolved oxygen in a receiving water after effluent is discharged. Stress caused by reduced dissolved oxygen levels makes organisms less competitive and less able to sustain their species in the aquatic environment. Although BOD is not a specific compound, it is defined as a conventional pollutant under the federal Clean Water Act.

**Bypass**—The intentional diversion of waste streams from any portion of the collection or treatment facility.

**Compliance Inspection - Without Sampling**—A site visit for the purpose of determining the compliance of a facility with the terms and conditions of its permit or with applicable statutes and regulations.

**Compliance Inspection - With Sampling**—A site visit to accomplish the purpose of a Compliance Inspection - Without Sampling and as a minimum, sampling and analysis for all parameters with limits in the permit to ascertain compliance with those limits; and, for municipal facilities, sampling of influent to ascertain compliance with the 85 percent removal requirement. Additional sampling may be conducted.

**Composite Sample**—A mixture of grab samples collected at the same sampling point at different times, formed either by continuous sampling or by mixing discrete samples. May be "time-composite" (collected at constant time intervals) or "flow-proportional" (collected either as a constant sample volume at time intervals proportional to stream flow, or collected by increasing the volume of each aliquot as the flow increased while maintaining a constant time interval between the aliquots).

**Construction Activity**—Clearing, grading, excavation, and any other activity which disturbs the surface of the land. Such activities may include road building; construction of residential houses, office buildings, or industrial buildings; and demolition activity.

**Continuous Monitoring**—Uninterrupted, unless otherwise noted in the permit.

**Distribution Uniformity**—The uniformity of infiltration (or application in the case of sprinkle or trickle irrigation) throughout the field expressed as a percent relating to the average depth infiltrated in the lowest one-quarter of the area to the average depth of water infiltrated.

**Engineering Report**—A document, signed by a professional licensed engineer, which thoroughly examines the engineering and administrative aspects of a particular domestic or industrial wastewater facility. The report shall contain the appropriate information required in WAC 173-240-060 or 173-240-130.

**Grab Sample**—A single sample or measurement taken at a specific time or over as short period of time as is feasible.

**Industrial Wastewater**—Water or liquid-carried waste from industrial or commercial processes, as distinct from domestic wastewater. These wastes may result from any process or activity of industry, manufacture, trade or business; from the development of any natural resource; or from animal operations such as feed lots, poultry houses, or dairies. The term includes contaminated storm water and, also, leachate from solid waste facilities.

**Maximum Daily Discharge Limitation**—The highest allowable daily discharge of a pollutant measured during a calendar day or any 24-hour period that reasonably represents the calendar day for purposes of sampling. The daily discharge is calculated as the average measurement of the pollutant over the day.

**Method Detection Level (MDL)**—The minimum concentration of a substance that can be measured and reported with 99 percent confidence that the analyte concentration is above zero and is determined from analysis of a sample in a given matrix containing the analyte.

**pH**—The pH of a liquid measures its acidity or alkalinity. A pH of 7 is defined as neutral, and large variations above or below this value are considered harmful to most aquatic life.

**Quantitation Level (QL)**—A calculated value five times the MDL (method detection level).

**Soil Scientist**—An individual who is registered as a Certified or Registered Professional Soil Scientist or as a Certified Professional Soil Specialist by the American Registry of Certified Professionals in Agronomy, Crops, and Soils or by the National Society of Consulting Scientists or who has the credentials for membership. Minimum requirements for eligibility are: possession of a baccalaureate, masters, or doctorate degree from a U.S. or Canadian institution with a minimum of 30 semester hours or 45 quarter hours professional core courses in agronomy, crops or soils, and have five, three, or one years, respectively, of professional experience working in the area of agronomy, crops, or soils.

**State Waters**—Lakes, rivers, ponds, streams, inland waters, underground waters, salt waters, and all other surface waters and watercourses within the jurisdiction of the state of Washington.

**Stormwater**—That portion of precipitation that does not naturally percolate into the ground or evaporate, but flows via overland flow, interflow, pipes, and other features of a storm water drainage system into a defined surface water body, or a constructed infiltration facility.

**Technology-based Effluent Limit**—A permit limit that is based on the ability of a treatment method to reduce the pollutant.

**Total Dissolved Solids**—That portion of total solids in water or wastewater that passes through a specific filter.

**Total Suspended Solids (TSS)**—Total suspended solids is the particulate material in an effluent. Large quantities of TSS discharged to a receiving water may result in solids accumulation. Apart from any toxic effects attributable to substances leached out by water, suspended solids may kill fish, shellfish, and other aquatic organisms by causing abrasive injuries and by clogging the gills and respiratory passages of various aquatic fauna. Indirectly, suspended solids can screen out light and can promote and maintain the development of noxious conditions through oxygen depletion.

**Water Quality-based Effluent Limit**—A limit on the concentration of an effluent parameter that is intended to prevent pollution of the receiving water.

*APPENDIX C—RESPONSE TO COMMENTS*

There were no comments received during the public comment period.